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7811 University Avenue La Mesa, CA 91942-0427

> (619) 466-0585 FAX (619) 466-1823 www.hwd.com

October 8, 2013

California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236

Attention: Mr. Keith Wallace, Project Manager

Subject: Proposition 84 Round 2, San Diego Region Grant Proposal

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Dear Mr. Wallace:

Helix Water District is the second largest retail water agency in San Diego County. Our public agency provides drinking water to a population of over 260,000 within several municipal jurisdictions of East San Diego County. We also provide water to several neighboring public water agencies. Our representatives have served on the Regional Advisory Committee (RAC) of the San Diego Integrated Regional Water Management (IRWM) group for the past 8 years. In that time we have seen the tremendous accomplishments resulting from the hard work and collaboration of a diverse group of stakeholders.

We are very supportive of all the projects submitted in our Proposition 84 Round 2 Grant proposal and feel these are truly aligned with the needs of the stakeholders, San Diego County communities and the intent of Proposition 84. We were extremely disappointed and surprised with the Department of Water Resources' (DWR's) scoring and draft funding levels for these San Diego projects. We specifically ask that the DWR change the scoring and fully fund the proposed projects for the San Diego region.

Please consider the following points:

- San Diego's Proposition 84 Round 2 Grant Proposal includes detailed and thoughtful analysis of the benefits that would accrue to our region. It deserves a higher score from DWR's evaluation and 100% funding.
- San Diego has reviewed the Department of Water Resources' Proposal Evaluation and disagrees with a majority of DWR statements that find fault with San Diego's proposal.

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San Diego has prepared a formal response to DWR's Proposal Evaluation, detailing point-by-point rebuttals of each of DWR's statements of underperformance.







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- San Diego's grant proposal is 615 pages long, along with hundreds of additional pages of backup documentation (planning, design, and environmental documents for each project), providing all the key information required by DWR.
- The level of detail provided in San Diego's Round 2 grant proposal is in line with previous grant rounds that received high ratings from DWR in the past.
- San Diego's IRWM project selection process is rigorous and competitive in identifying the region's high priority projects. The maximum allocation should be granted.
 - A total of 36 projects were submitted and considered for the Region's grant proposal.
 - The entire list of projects submitted to our online project database was evaluated by a RAC-nominated Project Selection Workgroup.
 - The Project Selection Workgroup met five times in November 2012 to review the details of the submitted projects and identify a package of projects to be submitted for Proposition 84 Round 2 funding.
 - Unlike some other regions, the San Diego IRWM program coordinated with neighboring regions to assure that our collective proposals did not exceed the maximum funding allocation stated in DWR's Proposal Solicitation Package (PSP).
 - DWR has recommended that some funding areas receive up to 200% of their maximum funding allocations, to the detriment of regions like ours, which is contrary to what is stated in DWR's PSP.
 - All 7 of the sponsors of proposed projects in San Diego's proposal were asked to reduce their funding requests and are essentially bare-bones proposals. Any reductions in grant funding will result in the elimination of viable, ready-to-go, high priority projects in the San Diego region.
- DWR's grant award process is counterproductive to IRWM ideals regional collaboration and goodwill are at stake.
 - San Diego's suite of projects submitted for Round 2 grant funding was forged by an in-depth review process that incorporated input from diverse stakeholder groups – including small non-governmental organizations.
 - Extensive outreach, workshops, and trainings were conducted to facilitate project integration – agencies and non-profits have forged lasting relationships through this effort.
 - The selection of 7 out of the 36 projects submitted was accomplished with tremendous levels of diverse stakeholder cooperation, collaboration, transparency, and regional goodwill.
 - The grant proposal was unanimously supported by San Diego's 34-member Regional Advisory Committee.



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- DWR's election to un-fund half of the monies that are dedicated to the San Diego region can only serve to destabilize the goodwill that the San Diego IRWM program has worked so hard to establish.
- DWR's interest in preserving "competition" over "integration" is contrary to the letter and intent of IRWM as was established by Proposition 84 and approved by the voters.

As previously stated, we request that DWR revise its scoring of San Diego's grant proposal and provide 100% funding of these vital San Diego region projects.

Respectfully,

Mark Umphres

Director of Water Quality and System Operations, Helix Water District

C. Carlos Lugo, General Manger

